

### REMARKS

Claims 1-18 and 22-33 are pending in this application. Claims 1 and 17 have been amended. Claims 19-21 have been canceled. New claims 31-33 have been added. Support for the amendments and new claims is found in the specification and claims as filed.

#### **Claim Rejection - 35 U.S.C. § 102(b)**

The Examiner has rejected Claims 1-4 under 35 U.S.C. §102(b) as being anticipated by Okano et al. (U.S. 4,547,289). "A rejection for anticipation under section 102 requires that each and every limitation of the claimed invention be disclosed in a single prior art reference." See, e.g., *In re Paulsen*, 31 U.S.P.Q.2d 1671 (Fed. Cir. 1994). Okano et al. does not disclose every element of Applicant's claims, and therefore cannot be considered as an anticipating reference under 35 U.S.C. § 102(b).

Pending independent Claim 1 recites a membrane filtration module comprising, *inter alia*, "at least one submodule connecting collar connected with said housing, said collar being adapted to receive and locate said submodule having a connecting sleeve with a locking formation whereby the submodule can be secured at an end with the collar by a clip adapted to engage both said collar and said locking formation and at least in part surround both said collar and said locking formation to prevent axial withdrawal of said submodule from said collar, wherein the clip is resiliently biased to enable radial contraction of the clip when the clip slidingly engages with the submodule and the collar."

Okhano et al. does not teach a membrane filtration module wherein the clip is resiliently biased to enable radial contraction of the clip when the clip slidingly engages with the submodule and the collar, and therefore cannot anticipate Claims 1-4. Accordingly, Applicants respectfully request that the rejection be withdrawn.

#### **Claim Rejection - 35 U.S.C. § 103(a)**

Claims 5-10 and 12-13 have been rejected under 35 U.S.C. §103(a) as obvious over Okano et al. in view of Jenkins (U.S. 6,048,454). To articulate a *prima facie* case of obviousness under 35 U.S.C. §103(a), the PTO must, *inter alia*, cite prior art that teaches or suggests all the claimed limitations. *In re Royka*, 490 F.2d 981 (C.C.P.A. 1974). Okano et al. and Jenkins, either

alone or in combination, do not disclose every element of Applicants' claims, and therefore cannot render obvious Applicants' claims.

As discussed above, pending independent Claim 1, from which Claims 5-10 and 12-13 depend, recites a membrane filtration module comprising, *inter alia*, "at least one submodule connecting collar connected with said housing, said collar being adapted to receive and locate said submodule having a connecting sleeve with a locking formation whereby the submodule can be secured at an end with the collar by a clip adapted to engage both said collar and said locking formation and at least in part surround both said collar and said locking formation to prevent axial withdrawal of said submodule from said collar, wherein the clip is resiliently biased to enable radial contraction of the clip when the clip slidingly engages with the submodule and the collar."

Neither Okhano et al. nor Jenkins teaches a membrane filtration module wherein the clip is resiliently biased to enable radial contraction of the clip when the clip slidingly engages with the submodule and the collar, and therefore cannot render obvious Applicants' claims. Accordingly, Applicants respectfully request that the rejection be withdrawn.

**Claim Rejection - 35 U.S.C. § 103(a)**

Claim 11 has been rejected under 35 U.S.C. §103(a) as obvious over Okano et al. in view of McKinney (U.S. 4,107,043). To articulate a *prima facie* case of obviousness under 35 U.S.C. §103(a), the PTO must, *inter alia*, cite prior art that teaches or suggests all the claimed limitations. *In re Royka*, 490 F.2d 981 (C.C.P.A. 1974). Okano et al. and McKinney, either alone or in combination, do not disclose every element of Applicants' claims, and therefore cannot render obvious Applicants' claims.

As discussed above, pending independent Claim 1, from which Claim 11 depends, recites a membrane filtration module comprising, *inter alia*, "at least one submodule connecting collar connected with said housing, said collar being adapted to receive and locate said submodule having a connecting sleeve with a locking formation whereby the submodule can be secured at an end with the collar by a clip adapted to engage both said collar and said locking formation and at least in part surround both said collar and said locking formation to prevent axial withdrawal of said submodule from said collar, wherein the clip is resiliently biased to enable radial contraction of the clip when the clip slidingly engages with the submodule and the collar."

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Neither Okhano et al. nor McKinney teaches a membrane filtration module wherein the clip is resiliently biased to enable radial contraction of the clip when the clip slidingly engages with the submodule and the collar, and therefore cannot render obvious Applicants' claim. Accordingly, Applicants respectfully request that the rejection be withdrawn.

**Claim Rejection - 35 U.S.C. § 103(a)**

Claims 17-30 have been rejected under 35 U.S.C. §103(a) as obvious over Selbie et al. (U.S. 5,405,528) in view of Okano et al. and Jenkins. To articulate a *prima facie* case of obviousness under 35 U.S.C. §103(a), the PTO must, *inter alia*, cite prior art that teaches or suggests all the claimed limitations. *In re Royka*, 490 F.2d 981 (C.C.P.A. 1974). Selbie et al., Okano et al., and McKinney, either alone or in combination, do not disclose every element of Applicants' claims, and therefore cannot render obvious Applicants' claims.

Pending independent Claim 17, and thus its dependent Claim 18, recite a membrane filtration apparatus comprising, *inter alia*, a headpiece removably connected at one end of said filter submodule, wherein "said headpiece is adapted for connection to a filtrate conduit allowing fluid communication between said headpiece and said filtrate conduit and said basepiece is adapted for connection to a cleaning fluid conduit allowing fluid communication between said basepiece and said cleaning fluid conduit" and "collars ... configured to allow placement of said cleaning fluid conduit at least partially between two pairs of said collars." Pending independent Claim 22, and thus its dependent Claims 23-29, recite a membrane filtration apparatus comprising, *inter alia*, a cleaning fluid conduit connected to at least one membrane filtration apparatus.

None of Selbie et al., Okano et al., and McKinney teaches a cleaning fluid conduit as recited in Claim 22, much less a membrane filtration apparatus as recited in Claim 17 wherein the basepiece is adapted for connection to a cleaning fluid conduit allowing fluid communication between the basepiece and the cleaning fluid conduit and wherein collars are configured to allow placement of the cleaning fluid conduit at least partially between two pairs of said collars. The element identified in Selbie et al. as a cleaning fluid conduit in the Office Action, element 43 of Figure 2, is a filtrate discharge passageway, not a cleaning fluid conduit. Therefore, the cited references, alone or in combination, cannot render obvious Applicants' claims.

Accordingly, Applicants respectfully request that the rejection be withdrawn.

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**Conclusion**

In view of the foregoing amendments and remarks, it is respectfully submitted that the present application is in condition for allowance. Should the Examiner have any remaining concerns that might prevent the prompt allowance of the application, the Examiner is respectfully invited to contact the undersigned at the telephone number below.

Respectfully submitted,

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Dated: 2/22/05

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